

1 NATALIE C. LEHMAN, ESQ.  
Nevada Bar No. 12995  
2 **FIDELITY NATIONAL LAW GROUP**  
8363 West Sunset Road, Suite 120  
3 Las Vegas, Nevada 89113  
Tel: (702) 667-3000  
4 Fax: (702) 938-8721  
Email: natalie.lehman@fnf.com  
5 *Attorneys for Plaintiff Leaderone Financial Corp*

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 LEADERONE FINANCIAL CORPORATION,

9 Plaintiff,

10 vs.

11 U.S. DEPARTMENT OF JUSTICE; JOSEPH H.  
RAMIREZ; DOES I-X; and ROE  
12 CORPORATIONS 1 –X,

13 Defendants.

Case No.: 2:18-cv-02138-KJD- DJA

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DEFENDANT  
JOSEPH H. RAMIREZ TO RESPOND TO  
PLAINTIFF’S MOTION FOR LEAVE TO  
AMEND COMPLAINT AND MOTION TO  
SUBSTITUTE PLAINTIFF  
(First Request)**

16 Plaintiff Leaderone Financial Corporation (hereinafter “Leaderone”), by and through its  
17 attorneys of record, Natalie C. Lehman, Esq. of the law firm Fidelity National Law Group, and  
18 Defendant Joseph H. Ramirez, by and through his counsel of record, Elizabeth S. Ashley, Esq., of the  
19 law firm Ashley Law, hereby jointly submit this stipulation and order to extend Defendant Joseph H.  
20 Ramirez’s deadline to file his response to Plaintiff’s Motion to Amend the Complaint (ECF No. 26)  
21 and Motion to Substitute Plaintiff (ECF No. 25), from April 30, 2020 to **May 15, 2020.**

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The parties have requested this extension in order to allow both sides time to evaluate a current and pending settlement offer, which was just made earlier this week. This is the parties' first request for an extension of this deadline, and is not intended to cause any delay or prejudice to any party.

DATED this 28<sup>th</sup> day of April, 2020.

FIDELITY NATIONAL LAW GROUP

/s/ Natalie C. Lehman

NATALIE C. LEHMAN, ESQ.

Nevada Bar No. 12995

8363 West Sunset Road, Suite 120

Las Vegas, Nevada 89113

(702) 667-3003

[Natalie.Lehman@fnf.com](mailto:Natalie.Lehman@fnf.com)

Attorneys for Leaderone

ASHLEY LAW

/s/ Elizabeth S. Ashley

ELIZABETH S. ASHLEY

Nevada Bar No. 7501

2470 St. Rose Parkway, Suite 110

Henderson, Nevada 89074

(702) 837-6605

[elizabeth@elizabethashleylaw.com](mailto:elizabeth@elizabethashleylaw.com)

Attorney for Joseph H. Ramirez

### **ORDER**

Based upon the stipulation of the parties, and good cause appearing,

**IT IS SO ORDERED.**

DATED this 29th day of April, 2020.



**UNITED STATES MAGISTRATE JUDGE**

**Case No. 2:18-cv-02138-KJD- DJA**